

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PANCOAST TRADING S.A. :

Plaintiff,	:	
		07 CV 8581 (GEL)
- against -	:	ECF CASE
EUROGRANI S.r.l.,	:	AFFIDAVIT OF CLAURISSE
		CAMPANALE-OROZCO

Defendant.	:	
		-----X

State of Connecticut)
)
 ss: SOUTHPOR
County of Fairfield)

Claurisse Campanale Orozco, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and represent the Plaintiff herein. I am familiar with the facts of this case and make this Affidavit in support of Plaintiff's Response to Defendant's Motion for Countersecurity.
2. On or about December 5, 2007, I spoke with James A. Saville, Jr., attorney for the Defendant who indicated that despite the Plaintiff's offer to post a letter of undertaking, his client had decided not to accept that form of security, but instead would be seeking a cash deposit into a joint escrow account.
3. A true and accurate copy of the e-mail sent to me from Ioanna Vita is attached hereto as Exhibit 1.
4. A true and accurate copy of the e-mail sent to me from James A. Seville, Jr. is attached hereto as Exhibit 2.

5. A copy of the case of *In the Matter of the Complaint of Compania Naviera Marasia S.A.*, 1980 A.M.C. 388 (S.D.N.Y. March 8, 1979), cited in Plaintiff's Response to Defendant's Motion For Countersecurity, but not officially reported, is attached hereto as Exhibit 3.

Dated: December 17, 2007
Southport, CT


Claurisse Campanale-Orozco

Sworn and subscribed to before me
this 17th day of December 2007.

Alawn Kubil
Notary Public